

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER GRAY,

Defendant.

Case:2:21-cr-20516
Judge: Hood, Denise Page
MJ: Grand, David R.
Filed: 08-11-2021 At 11:59 AM
INDI USA V. GRAY (DA)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
SEX TRAFFICKING OF CHILDREN
(18 U.S.C. § 1591(a))

Beginning on or about March 29, 2021 and continuing through approximately April 5, 2021, the defendant, CHRISTOPHER GRAY, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, in and affecting interstate and foreign commerce, Minor Victim One (“MV-1”), an individual born in 2006, having had a reasonable opportunity to observe MV-1 and knowing and in reckless disregard of the fact that MV-1 had not attained the age of 18 years, and that MV1 would be caused to engage in a

commercial sex act all in violation of Title 18, United States Code, Section 1591(a).

COUNT TWO
PENALTIES FOR REGISTERED SEX OFFENDERS
(18 U.S.C. § 2260A)

Beginning on or about March 29, 2021 and continuing through approximately April 5, 2021, the defendant, CHRISTOPHER GRAY, being required by law to register as a sex offender, committed a felony offense involving a minor in violation of Title 18, United States Code, Section 1591, as charged in count one of this Indictment all in violation of Title 18, United States Code, Section 2260A.

FORFEITURE ALLEGATION
CRIMINAL FORFEITURE
(18 U.S.C. § 1594(d)(1), (2))

The allegations contained in count one of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 1594(d).

Pursuant to 18 U.S.C. § 1594(d), upon conviction of an offense in violation of 18 U.S.C. § 1591(a), the defendant shall forfeit to the United States of America:

(1) any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense, and any property traceable to

such property; and (2) any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense, and any property traceable to such property.

Such property includes, but is not limited to, a money judgment equal to an amount as proved in this matter, representing the total value of property subject to forfeiture from the defendant for his violation of 18 U.S.C. § 1591(a), as alleged in Count One of this Indictment. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

[Space left intentionally blank.]

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson _____
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

BENJAMIN C. COATS
Chief, Major Crimes Unit
Assistant United States Attorney

s/Christopher W. Rawsthorne _____
CHRISTOPHER W. RAWSTHORNE
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Dated: August 11, 2021

United States District Court
Eastern District of Michigan

Criminal Case Cov

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.

Companion Case Information		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: <i>CRW</i>

Case Title: USA v. CHRISTOPHER GRAY

County where offense occurred : Wayne

Check One: Felony Misdemeanor Petty

- Indictment/ Information --- no prior complaint.
✓ Indictment/ Information --- based upon prior complaint [Case number: 21-mj-30365] 1
 Indictment/ Information --- based upon LCrR 57.10 (d) [*Complete Superseding section below*].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- Corrects errors; no additional charges or defendants.
 Involves, for plea purposes, different charges or adds counts.
 Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 11, 2021

Date

CRW
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Attorney Bar #: P84401

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.